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June 8, 2021

BY ECF

Honorable Allen K. Hellerstein
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street, Rm. 1106
New York, New York 10007

Upon Defendants' request and Plaintiffs' consent, the time for the City Defendants to respond to the Complaint in this action is enlarged from June 11, 2021, to July 12, 2021.

So ordered.
/s/ Hon. Alvin K. Hellerstein
June 9, 2021

Re: Shargani v. New York City Department of Environmental Protection, et al.
20 CV 10237 (AKH)

Dear Judge Hellerstein:

I am an Assistant Corporation Counsel in the office of Georgia M. Pestana, Acting Corporation Counsel of the City of New York, attorney for defendants New York City Department of Environmental Protection and the City of New York ("City Defendants").¹ I write to respectfully request that Your Honor extend the time for the City Defendants to respond to the Complaint in this action from June 11, 2021 to July 12, 2021. I have conferred with Plaintiffs' counsel via telephone, and he consents to the extension request.

This extension of time is necessary because, as has been widely reported in the media, our office has had a complete loss of technological access and resources. Over the past weekend, access to the New York City Law Department's network and emails was disabled and, unfortunately, access has not yet been restored nor has it been indicated when it will be restored. Accordingly, I do not have any access to my work product and email to formulate a response to the Complaint. In addition, this office, without appearing on behalf of individually named defendant Delaney, requests that the Court also extend, *sua sponte*, the time for defendant Delaney to respond to the Complaint in order to preserve his rights.

This is Defendants' first request for an extension of time to respond to the Complaint. The requested extension will not affect any scheduled dates and the parties do not have any scheduled appearances before the Court. Accordingly, Defendants respectfully request that the for the City Defendants to respond to the Complaint in this action from June 11, 2021 to July 12, 2021.

¹ Upon information and belief, individually named defendant Dennis Delaney has not yet been served.

Thank you for Your Honor's consideration of this request.

Respectfully submitted,
/s/ Dominique F. Saint-Fort
Dominique F. Saint-Fort
Assistant Corporation Counsel

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